

SEP 06 2017

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

MATTHEW J. DYKMAN  
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**ROY GILBERT HEILBRON,**

Defendant.

CRIMINAL NO. 17-2389 WJ

Count 1: 18 U.S.C. § 1001(a)(3):  
Making or Using a False Writing;

Count 2: 18 U.S.C. § 1512(c)(2):  
Obstruction of Justice.

INDICTMENT

The Grand Jury charges:

Count 1

On or between August 3, 2017, and August 7, 2017, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendant, **ROY GILBERT HEILBRON**, did willfully and knowingly make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the judicial branch of the Government of the United States, by making and presenting to M.B., a United States Probation Officer, a false and fraudulent Clinical Summary and Treatment Protocol supposedly created by O.P., well knowing and believing that O.P. did not create the documents.

In violation of 18 U.S.C. § 1001(a)(3).

Count 2

On or between August 3, 2017, and August 7, 2017, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendant, **ROY GILBERT HEILBRON**, did corruptly attempt to obstruct, influence, and impede criminal case 15-CR-2030 in the United States

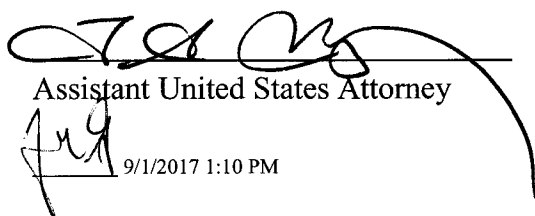

District Court for the District of New Mexico, an official proceeding, by submitting false and fraudulent documents to postpone and avoid his sentencing hearing.

In violation of 18 U.S.C. § 1512(c)(2).

A TRUE BILL:

/s/

FOREPERSON OF THE GRAND JURY

  
Assistant United States Attorney  
 9/1/2017 1:10 PM